

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

NYEISHA S. GHEE,

Plaintiff,

v.

Civil Action No.: 3:25-cv-17-RCY

PINETREE APARTMENTS, LLC,

Defendant.

PINETREE APARTMENTS, LLC’S
PARTIAL 12(b)(6) MOTION TO DISMISS PLAINTIFF’S AMENDED COMPLAINT

Pursuant to Local Rule 7 and Rule 12(b)(6) of the Federal Rules for Civil Procedure, the defendant, Pinetree Apartments, LLC (“Pinetree”), by counsel, hereby submits this Partial 12(b)(6) Motion to Dismiss Plaintiff’s Amended Complaint related to any claim for concealment, negligent repair, willful and wanton negligence, and punitive damages for failure to state a claim upon which relief can be granted. This Motion is based on this notice, the accompanying Memorandum in Support, and any other evidence and argument this Court may entertain.

Respectfully submitted,

PINETREE APARTMENTS, LLC

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CERTIFICATION

I hereby certify that on this 28th day of March, 2025, I electronically filed the forgoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

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